

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
: :
v. : Crim. No. 12-
: :
KEISHA JACKSON : 18 U.S.C. § 1349

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Background

1. At all times relevant to this Information:
 - a. A pharmaceutical company headquartered in the State of Illinois (the "Pharma Company") manufactured medicines, including FDA-approved prescription medicines approved for the treatment of HIV and cancer.
 - b. The medicines manufactured by the Pharma Company for the treatment of HIV included what are referred to herein as "HIV Medicine 1" and "HIV Medicine 2."
 - c. The medicines manufactured by the Pharma Company for the treatment of cancer included what is referred to herein as "Cancer Medicine."
 - d. In order to provide medicines - including HIV Medicine 1, HIV Medicine 2, and Cancer Medicine - at no cost to qualified patients experiencing financial difficulties, the Pharma Company formed a foundation that was organized as a

corporation and headquartered in the State of Illinois (the "Patient Assistance Foundation").

e. The Pharma Company donated quantities of HIV Medicine 1, HIV Medicine 2, and Cancer Medicine (among other medicines) to the Patient Assistance Foundation so that the donated medicines could be given to qualified patients (the "Donated Medicines Program").

f. A corporation ("IHI") headquartered in Burlington, Massachusetts, maintained regional offices in various locations, including Somerset, New Jersey. One service IHI furnished to its customers was administrative support for donated medicines programs, such as that offered by the Patient Assistance Foundation.

g. The Patient Assistance Foundation contracted with IHI for IHI to provide administrative support in operating the Donated Medicines Program.

h. IHI employed Customer Service Administrators ("CSAs"). CSAs were responsible for, among other things, receiving applications for the Donated Medicines Program, entering those applications into IHI's computer system, and using IHI's computer system to cause medicines donated by the Patient Assistance Foundation ("Donated Medicines") to be delivered to the physicians of patients who met certain eligibility criteria, including financial status.

i. From in or around December 2008 though in or around April 2010, defendant KEISHA JACKSON worked as a CSA at IHI's Somerset, New Jersey location.

j. From in or around July 2008 through in or around December 2010, coconspirator Lateefah McKenzie Body, who is not named as a defendant herein, worked as a CSA at IHI's Somerset, New Jersey location.

k. From in or around January 2009 through in or around July 2011, coconspirator Jameshia Bryant, who is not named as a defendant herein, worked as a CSA at IHI's Somerset, New Jersey location.

The Conspiracy

2. From at least as early as in or about July 2010 through at least in or about July 2011, in Somerset County, in the District of New Jersey, and elsewhere, defendant

KEISHA JACKSON

did knowingly and intentionally conspire with Lateefah McKenzie Body, Jameshia Bryant, and others, to devise a scheme and artifice to defraud the Patient Assistance Foundation, the Pharma Company, and IHI, and to obtain money and property from the Patient Assistance Foundation, the Pharma Company, and IHI, by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing this scheme and artifice to defraud, to cause to be sent and delivered by a commercial interstate carrier, certain mail matter, contrary to Title 18, United States Code, Section 1341.

The Object of the Conspiracy

3. The primary object of the conspiracy was for defendant KEISHA JACKSON, along with coconspirator Lateefah McKenzie Body, coconspirator Jameshia Bryant, and others, to misappropriate Donated Medicines by diverting those Donated Medicines from the Donated Medicines Program in a manner that would deceive the Patient Assistance Foundation, the Pharma Company, and IHI into believing that the Donated Medicines had been properly distributed.

The Manner and Means of the Conspiracy

4. It was a part of the conspiracy that, from as early as in or about July 2010 until she was terminated from employment at IHI in or about December 2010, coconspirator Lateefah McKenzie Body knowingly and intentionally used her access to IHI's computer system to intentionally enter hundreds of fraudulent orders, causing Donated Medicines to be sent by commercial interstate carrier Federal Express (hereinafter "FedEx") to locations controlled by or readily accessible to the conspirators ("Unauthorized Locations"), including defendant KEISHA JACKSON's residence in Perth Amboy, New Jersey.

5. After coconspirator Lateefah McKenzie Body was terminated from employment at IHI in or about December 2010, coconspirator Jameshia Bryant began using her access to IHI's computer system to enter additional fraudulent orders. From January 2011 until she was terminated from employment at IHI in or about July 2011, coconspirator Jameshia Bryant entered hundreds of fraudulent orders, causing Donated Medicines to be

sent by FedEx to Unauthorized Locations controlled by or readily accessible to the conspirators, including defendant KEISHA JACKSON's residence in Perth Amboy, New Jersey.

6. For example, on or about July 12, 2010, coconspirator Lateefah McKenzie Body caused a fraudulent order to be placed that was identified in IHI's computer system as order number 1369121. This fraudulent order resulted in the shipment by FedEx of a quantity of HIV Medicine 2 tablets to defendant KEISHA JACKSON's residence in Perth Amboy, New Jersey on or about July 13, 2010.

7. The misrepresentations contained in the fraudulent orders were relied upon by the Patient Assistance Foundation, the Pharma Company, and IHI when fulfilling those orders and causing the Donated Medicines to be delivered to Unauthorized Locations controlled by or readily accessible to the conspirators.

8. As a result of the conspiracy, defendant KEISHA JACKSON, coconspirator Lateefah McKenzie Body, coconspirator Jameshia Bryant, and others, sought to, and did, misappropriate Donated Medicines with a wholesale acquisition cost of more than \$7 million.

All in violation of Title 18, United States Code, Section 1349.



PAUL J. FISHMAN
UNITED STATES ATTORNEY

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INFORMATION FOR

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